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December 18, 2019

WEWO ENDORSED

Via ECF

The Honorable Ronnie Abrams United States District Court For the Southern District of New York 40 Foley Square, Room 2203 New York, NY 10007

Re: Thorne v. Boston Market Corporation, No. 1:19-cv-09932-RA
Request to Extend Defendant's Time to Respond to Complaint

Dear Judge Abrams:

We represent defendant Boston Market Corporation ("Defendant") in the above-referenced action. Pursuant to Rules 1(A) and 1(D) of Your Honor's Individual Practices , we write with the consent of counsel for plaintiff Braulio Thorne ("Plaintiff"), respectfully to request that the Court extend Defendant's time to respond to the Complaint from December 30, 2019 to January 29, 2020. This is Defendant's second request for an extension of time to file a response to the Complaint. Defendant previously requested an extension of time in order to permit counsel for Defendant, who had recently been engaged in this matter, to become familiar with the facts and allegations contained in the Complaint. The Court granted Defendant's request. In support of this request, counsel for Defendant states that this extension, if granted, will permit counsel additional time to prepare Defendant's response to the Complaint (which is currently due just before the New Year's holiday). If granted, this extension will not affect any other dates scheduled in this action. As noted, Plaintiff's counsel consents to this request.

We thank the Court in advance for its consideration of this request.

Respectfully submitted, /s/ Michael F. Fleming Michael F. Fleming

Attorney for Defendant

cc: All Counsel of Record (via ECF)

Application granted.

SO ORDERED.

Ronnie Abrams, U.S.D.J. December 19, 2019

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